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Hearing Date: November 30, 2011 at 10:00 a.m. (Eastern Time)

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Janet M. Bollinger Attorneys for RIC-OMIGSA Global Bond Fund

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

	X	
	:	
In re:	:	
	:	Chapter 11 Case No. 08-13555 (JMP)
LEHMAN BROTHERS HOLDINGS INC, et al.	:	-
	:	(Jointly Administered)
Debtors.	:	•
	:	
	X	

RESPONSE AND JOINDER OF RIC-OMIGSA GLOBAL BOND FUND TO RESPONSE OF THE ROYAL BANK OF SCOTLAND PLC TO DEBTORS' TWO HUNDRED AND SEVENTEENTH OMNIBUS OBJECTION TO CLAIMS

TO THE HONORABLE JAMES M. PECK, UNITED STATES BANKRUPTCY JUDGE:

RIC-OMIGSA Global Bond Fund ("<u>RIC-OMIGSA</u>"), by its undersigned counsel, hereby submits this Response and Joinder to the Response of The Royal Bank of Scotland PLC (the "<u>RBS Response</u>") [Dkt. No. 21989] to Debtors' Two Hundred and Seventeenth Omnibus Objection to Claims, (the "<u>Objection</u>") [Dkt. No. 20106] filed September 16, 2011 by Lehman Brothers Holdings Inc. ("<u>LBHI</u>") and its affiliated debtors in the above-captioned chapter 11 cases. RIC-OMIGSA respectfully represents as follows:

- RIC-OMIGSA joins in the RBS Response to the Objection for the reasoning set forth in the Objection.
- 2. RIC-OMIGSA filed claim number 60874 (the "Claim") on November 2, 2009 in accordance with the Court's order setting forth procedures and deadlines for filing proofs of claim, dated July 2, 2009 [Dkt. No. 4271]. The Claim is attached hereto as Exhibit A.

- 3. The Objection requests the disallowance and expungment of the Claim that relates to ISIN XS0243852562 (the "Security") on the ground that the Security is guaranteed by non-Debtor Lehman Brothers Holdings plc. The Security was included in the list of Lehman Program Securities which the Debtors published on their restructuring website and which is attached as Exhibit C to the RBS Response. Additionally, the Security has the same ISIN as claim number 59649, which is the claim at issue in the RBS Response, which is attached as Exhibit A to the RBS Response.
- 4. As demonstrated in the RBS Response, as of LBHI's petition date, RIC-OMIGSA had a valid claim against LBHI for the Security as a result of the LBHI adopted resolutions, attached to the RBS Response as Exhibit D.
- 5. RIC-OMIGSA reserves any and all applicable rights at law and/or equity, all claims, and all defenses, including without limitation the right to discovery in connection with the Objection and the right to amend or supplement this response and to join in the response of any other party to the Objection.

WHEREFORE, RIC-OMIGSA requests that the Court deny the Objection with respect to the Claim, allow the Claim, and grant RIC-OMIGSA such other and further relief as the Court deems just and proper.

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Dated: New York, New York November 11, 2011

Respectfully Submitted,

DECHERT LLP

By: /s/ Glenn E. Siegel

Glenn E. Siegel Janet M. Bollinger

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janet.bollinger@dechert.com

Attorneys for RIC-OMIGSA Global Bond Fund

16816012

EXHIBIT A

United States Bankrapter Court/Southern District of New York Lehman Brothert Holding: Claims Processing Center co Epiq Bankrapter Solumons, ILC FDR Station, P.O. Box, 5076 New York, NY 10150-5076	LEHMAN SECURITIES PROGRAMS PROOF OF CLAIM						
In Re: Lebrara Brothers Holdings Inc., et al., Debrors. Chapter 11 Care No. 98-13555 (JMP) (Jountly Admiringtered)	Filed: USBC - Southern District of New York Lehman Brothers Holdings Inc., Et Al. 08-13555 (JMP) 0000060874						
Note: This form may not be used to file claims other than those based on Lehman Programs Securities as listed on http://www.lehman-docket.com as of July 17, 2009							
Name and address of Creditor: (and name and address where notices should be Creditor)	cent if different from Check this box to indicate that this						
RIC-OMIGSA Global Bond Fund	claim amends a previously filed claim.						
909 A St	Court Claim Number:						
Tacoma, WA 98402	(If brown)						
	Filed on:						
Telephone ramber: 253.439.2959 Emul Address: ecohen@russell.com							
Name and address where payment should be sent (if different from above)	Check this box if you are aware that						
State Street Bank & Trust Co.; BIC SBOSUS3N ABA:026009166 Acc#:40434901 Ref: NIS9, RIC-OMIGSA Global Bond Fund	anyone else has filed a proof of claim relating to your claim. Attach copy of						
fundsops-fandmteam@russell.com	statement giving particulars.						
Telephone number: Emzil Address:							
Programs Securities as of September 15, 2008, whether you owned the Lehman and whether such claim matured or became fixed or liquidated before or after Sidoliars, using the exchange rate as applicable or September 15, 2008. If you are you may attach a schedule with the claim amounts for each Lehman Programs Sidolians of Claim: \$\frac{\$1,959,723.54}{(Required)}\$ Check this box if the amount of claim includes interest or other charges in the Program Sidolians with respect to more than one Lehman Programs Security, you may a which this claim relates. International Securities Identification Number (ISIN): See attached detail	eptember 15, 2008. The claim amount must be stated in United States filing this claim with respect to more than one Lehman Programs Security, ecunity to which this claim relates. addition to the principal amount due on the Lehman Programs Securities. Lehman Programs Security to which this claim relates. If you are filing tach a schedule with the ISDNs for the Lehman Programs Securities to						
appropriate (each, a "Blocking Number") for each Lehman Programs Security for from your accountholder (i.e. the bank, broker or other entity that holds such sec	3. Provide the Clearstream Bank Blocking Number, a Euroclear Bank Electromic Reference Number, or other depository blocking reference number, as appropriate (each, a "Blocking Number") for each Lehman Programs Security for which you are filing a claim. You must acquire a Blocking Number from your accommholder (i.e. the bank, broker or other entity that holds such securities on your behalf). If you are filing this claim with respect to more than one Lehman Programs Security, you may attach a schedule with the Blocking Numbers for each Lehman Programs Security to which this claim relates.						
**	ng Adminests for each Deminar Programs Security to which this claim						
number:	n Reference Number and or other depository blocking reference						
Clearstream Bank Blocking Number. Euroclear Bank Electronic Instruction umber: See attached detail (Require	n Reference Number and or other depository blocking reference						
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Claim No. LBHI3011 Details - Trn Ref# 3653

Account	NIS9 - OMAM	Clear Stream Blocking CA25196 Reference #
As of Date	15Sep2008	Clear Stream Participatory 13163 Account #
Asset Type	Fixed Income	
Asset ID	XS0243852562	
Security Description	LEHMAN BROTHERS UK III,1%,due 02/28/2049	
No. of Shares or Units Held	300,000.00 (A)	en anticologica de la contrata de l La contrata de la contrata del contrata de la contrata de la contrata del contrata de la contrata del contrata de la contrata de la contrata de la contrata del contrata de la contrata de la contrata de la contrata de la contrata del contrata del contrata del contrata de la contrata del c
Trade Date		·
Settlement Date		•
Maturity Date	28Feb2049	

Additional Costs		
Trading Costs		(B)
Overdraft Charges		(C)
Use of Funds		(D)
Interest Accrued	6,543.03	(E)

Currency Conversi	on
(F) Gain/Loss Local = (A) +(B)+(C)-(D)+(E)	306,543.03
Currency	EUR
(G) Ex Rate	1.4189
Ex Rate Dt	15Sep2008

Russell Rec/(Pay) in USD = (F)*(G) 434,953.91

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Claim No. LBHI3011 Details - Trn Ref# 3654

Account	NIS9 - OMAM	Clear Stream Blocking CA13341 Reference #
As of Date	15Sep2008	Clear Stream Participatory 13163 Account #
Asset Type	Fixed Income	
Asset ID	XS0287044969	
Security Description	LEHMAN BROS HLDGS,1%,due 03/14/2019	
No. of Shares or Units Held	1,050,000.00 (A)	
Trade Date		
Settlement Date		
Maturity Date	14Mar2019	•

Additional Costs		
Trading Costs		(B)
Overdraft Charges		(C)
Use of Funds		(D)
Interest Accrued	24,613.88	(E)

Currency Convers	ion
(F) Gain/Loss Local = (A) +(B)+(C)-(D)+(E)	1,074,613.88
Currency	EUR
(G) Ex Rate	1.4189
Ex Rate Dt	15Sep2008

Russell Rec/(Pay) in USD = (F)*(G) 1,524,769.63

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Attorneys for RIC-OMIGSA Global Bond Fund

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

: Chapter 11

LEHMAN BROTHERS HOLDINGS
INC.
: Case No. 08-13555 (JMP)
:
Debtor.
: (Jointly Administered)

ADDENDUM TO PROOF OF CLAIM OF RIC-OMIGSA GLOBAL BOND FUND

This Addendum is submitted with, and incorporated in, the proof of claim (the "<u>Proof of Claim</u>") filed in this case by RIC-OMIGSA Global Bond Fund ("<u>Russell</u>").

On September 15, 2008, Lehman Brothers Holdings Inc. (the "<u>Debtor</u>") filed for bankruptcy protection in the United States Bankruptcy Court for the Southern District of New York (the "<u>Court</u>"). Pursuant to the Court's order, dated July 2, 2009, setting a deadline and establishing procedures for filing proofs of claim (the "<u>Bar Date Order</u>"), entities that file claims based on any Lehman Program Security are not required to attach or submit any documentation supporting any such Lehman Program Security. Russell is a subscriber of a certain series of notes identified on http://lehman-docket.com under the heading "Lehman Program Securities."

CLASSIFICATION AND AMOUNT OF CLAIM

The claim filed hereunder is an unsecured claim. The Debtor is indebted and liable to Russell in the total liquidated amount of \$1,959,723.54.¹

The claim amount was converted to US Dollar from Euro using the exchange rate of September 15, 2008, pursuant to the Bar Date Order. Notwithstanding such conversion, however, claimant reserves all rights as to the appropriateness and timing of this conversion for purposes of recovery against this Debtor.

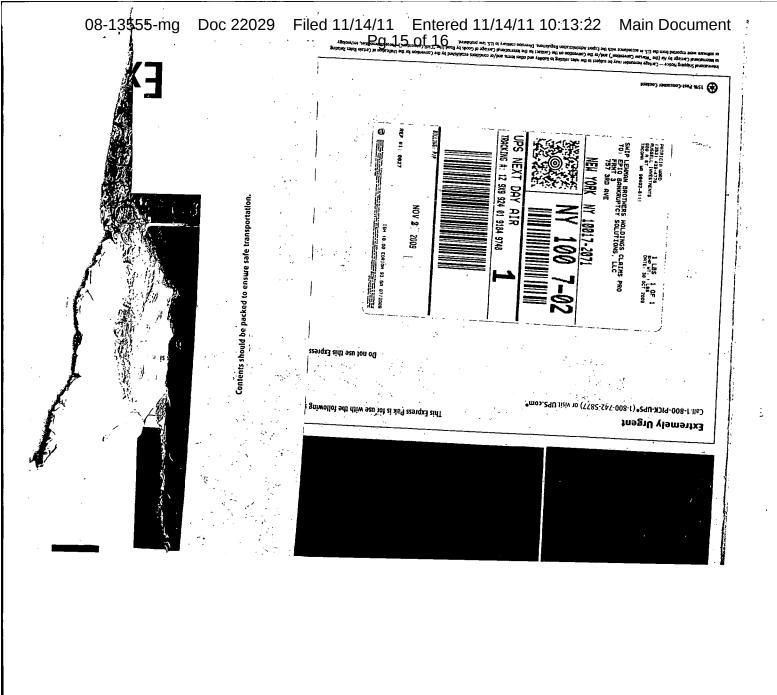
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RESERVATION OF RIGHTS AND CLAIMS

This Proof of Claim is not and shall not be deemed or construed as (a) a waiver or release of Russell's rights against any person, entity or property (including, without limitation, any person or entity that is or may become a debtor in a case pending in this Court); (b) a consent by Russell to the jurisdiction of this Court or any other court with respect to proceedings, if any, commenced in any case against or otherwise involving Russell; (c) a waiver or release of Russell's right to trial by jury in this Court or any other court in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private rights or in any case, controversy or proceeding related hereto, notwithstanding the designation or not of such matters as "core proceedings" pursuant to 28 U.S.C. § 157(b)(2), and whether such jury trial right is pursuant to statute or the United States Constitution; (d) a consent by Russell to a jury trial in this Court or any other court in any proceeding as to any and all matters so triable herein or in any case, controversy or proceeding related hereto, pursuant to 28 U.S.C. § 157(e) or otherwise; (e) a waiver or release of Russell's right to have any and all final orders in any and all non-core matters or proceedings entered only after de novo review by a United States District Court Judge; (f) a waiver of the right to move to withdraw the reference with respect to the subject matter of this Claim, any objection thereto or other proceeding which may be commenced in this case against or otherwise involving Russell; (g) an election of remedies; or (h) consent to the final determination or adjudication of any claim or right pursuant to 28 U.S.C. § 157(c).

Russell reserves the right to supplement or amend this Proof of Claim in any respect, to specify and quantify expenses or other charges or claims incurred by Russell, to assert any additional claim for priority or request for payment of administrative expenses, and to file additional proofs of claim for additional claims.

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